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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
 JEREMY DAVIS, CHRISTOPHER  
 CASTILLO, and MONIQUE TRUJILLO  
 individually and on behalf of all other  
 similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

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 Steven M. Shepard (admitted *pro hac vice*)  
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Case No.: 5:20-cv-03664-LHK-SVK

**[PROPOSED] ORDER REQUIRING  
 GOOGLE TO SEARCH AND PRODUCE  
 ADDITIONAL ESI FOR SUNDAR  
 PICHAI (DISPUTE P22)**

**[PROPOSED] ORDER**

Before the Court is Plaintiffs' request for an Order requiring Google to search and produce additional ESI for current custodian Sundar Pichai (Dispute P22).

Having considered Plaintiffs' request, and good cause having been shown, the Court **GRANTS** Plaintiffs' request and **ORDERS** as follows:

Google shall search and produce ESI for Sundar Pichai for the additional time period February 1, 2015 through the present. Google shall use the same limited set of searches previously used for Mr. Pichai, plus the following searches:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

- consent AND (pseudonym! OR unauth!)

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

Honorable Susan van Keulen  
United States Magistrate Judge